

4

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

EUGENE REESE,

Defendant.

Case:2:16-cr-20697

Judge: Steeh, George Caram

MJ: Stafford, Elizabeth A.

Filed: 10-19-2016 At 12:11 PM

INDI USA v. REESE (SO)

21 U.S.C. § 846

21 U.S.C. § 841(a)(1)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

(21 U.S.C. §§ 846 and 841(a)(1) – *Conspiracy to Distribute and Possess With Intent to Distribute Heroin*)

From on or about May, 2015, to on or about May, 2016, in the Eastern District of Michigan, Southern Division, and elsewhere, the defendant, EUGENE REESE, knowingly and intentionally conspired and agreed with other individuals, known and unknown to the Grand Jury, to distribute and possess with the intent to distribute a controlled substance; namely, 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

COUNT TWO

(21 U.S.C. § 841(a)(1) – *Possession With Intent to Distribute Heroin*)

On or about May 19, 2016, in the Eastern District of Michigan, Southern Division, the defendant, EUGENE REESE, knowingly and intentionally possessed, with the intent to distribute, a controlled substance; namely, a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

FORFEITURE ALLEGATIONS

(21 U.S.C. § 853 – *Criminal Forfeiture*)

1. The allegations contained in Counts One through Two of this Indictment are hereby incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 21, United States Code, Section 853.

2. As a result of the foregoing violations of Title 21, United States Code, Sections 846 and 841, as charged in Counts One and Two, the defendant, EUGENE REESE, shall forfeit to the United States: (a) any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such violations; and (b) any property used, or intended to be used, in any manner or part, to commit or to facilitate the commission of such violations.

3. Substitute Assets. Pursuant to Title 21, United States Code, Section 853(p), the defendant, EUGENE REESE, shall forfeit substitute property, up to the

value of the properties described in paragraph 2 above, if, by any act or omission of the defendant, the property described in paragraph 2 cannot be located upon the exercise of due diligence; has been transferred, sold to or deposited with a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

4. Money Judgment. Upon conviction of one or more violations alleged in this Indictment, the United States will seek a forfeiture money judgment against the defendant, EUGENE REESE, in an amount representing the total amount of proceeds obtained as a result of the defendant's offenses.

THIS IS A TRUE BILL.

s/Grand Jury Foreperson
Grand Jury Foreperson

BARBARA L. MCQUADE
United States Attorney

s/ Christopher Graveline
CHRISTOPHER GRAVELINE
Chief, Violent and Organized Crime Unit

s/ Louis Crisostomo
LOUIS CRISOSTOMO
Assistant U.S. Attorney

s/ Rajesh Prasad
RAJESH PRASAD
Assistant U.S. Attorney

United States District Court
Eastern District of Michigan

Criminal Case Cover

Case: 2:16-cr-20697
Judge: Steeh, George Caram
MJ: Stafford, Elizabeth A.
Filed: 10-19-2016 At 12:03 PM
INDI USA v. REESE (SO)

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete

Companion Case Information	Companion Case Number: 16-MJ-30436
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	AUSA's Initials: <u>LAC</u>

Case Title: USA v. EUGENE REESE

County where offense occurred : Wayne

Check One: ☒ Felony ☐ Misdemeanor ☐ Petty

☐ Indictment/ ☐ Information --- no prior complaint.
☒ Indictment/ ☐ Information --- based upon prior complaint [Case number: 16-MJ-30436]
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: _____ Judge: _____

- ☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name

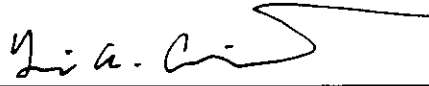
Charges

Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

October 19, 2016

Date


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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.